



CALIFORNIA  
DEPARTMENT OF  
EDUCATION

**JACK O'CONNELL**  
STATE SUPERINTENDENT OF PUBLIC INSTRUCTION

December 13, 2010

U.S. Department of Education  
400 Maryland Avenue, SW., LBJ  
Washington, DC 20202-4537

RE: OMB 1875-NEW (4266) – Equitable Distribution of Effective Teachers: State and Local Responses to Federal Initiatives

To Whom It May Concern:

The California Department of Education (CDE) appreciates the opportunity to review and comment on the Equitable Distribution of Effective Teachers: State and Local Responses to Federal Initiatives data collection as proposed in the Federal Register, Volume 75, No. 213 on November 4, 2010. Following are our comments.

### **CDE DATA AVAILABILITY**

At this time, the CDE staff are in the planning phase regarding the move from High Quality Teacher (HQT) compliance to teacher effectiveness. The CDE does not currently have data available to fully complete the State Data Request file. Although the CDE has an approved project to develop the California Longitudinal Teacher Information Data Education System (CALTIDES), that system is scoped to collect data to meet the HQT requirements, support county offices in monitoring districts' teacher assignments for appropriateness, evaluate teacher preparation programs and research teacher workforce issues. The scope of that system does not include evaluating an individual teacher's performance. The system development will not start before March 2011.

### **ESTIMATED HOURS OF BURDEN**

The CDE has concerns regarding the U.S. Department of Education's estimated hours of reporting burden. We believe the estimated burden is underestimated for the following reasons:

- It assumes that only one person from each state will be responding to the survey. This is highly unlikely especially in the larger states.
- It assumes that only one person from each LEA will be responding to the survey. This is highly unlikely especially in the larger states.

- It assumes that no state or LEA will review the proposed draft report when it is published for public review and comment.

The estimate of 1 hour for completing the data request is insufficient and would require about 2 to 3 hours given staff from several divisions are involved in collecting and reviewing the data. The estimate of 1.75 hours for conducting the interview would require more than 1.75 hours of CDE staff because more than one staff would be involved in the telephone interview. From the documents reviewed, it appears the interviews do not include any estimates for follow-up if the SEA is unable to provide a response during the interview.

### **CLOSING REMARKS**

The CDE understands the proposed survey is voluntary and we appreciate that it is not mandatory. ED's response to these comments should be addressed to Sonya Edwards in the Data Management Division at [sedwards@cde.ca.gov](mailto:sedwards@cde.ca.gov).

Sincerely,

Keric Ashley  
Director, Data Management Division

Insert response letter.